

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-CR-20114-KMW

UNITED STATES OF AMERICA

vs.

CARLOS RAMON POLIT FAGGIONI,

Defendant.

JOINT STATUS REPORT PROPOSING SCHEDULING ORDER

The United States of America, by and through its undersigned counsel, respectfully submits the following joint status report proposing a pretrial schedule.

The defendant, Carlos Ramon Polit was arraigned on May 27, 2022, on an indictment charging money laundering offenses [DE 1]. On June 3, 2022, the Court entered an Order setting pre-trial schedule and procedures and scheduling trial to commence on July 18, 2022 [DE 50]. The trial date has been reset multiple times: initially to May 22, 2023 [DE 57], then to October 23, 2023 [DE 89], to January 23, 2024 [DE 101] and, most recently, to April 8, 2024 [DE 112].

After conferring, the parties respectfully propose the following schedule to prepare for an April 8, 2024, trial and respectfully request that the Court enter a scheduling order as follows:

- December 22, 2023: Motion for Rule 15 depositions
- February 5, 2024: United States' expert disclosure
- February 12, 2024: Defendants' expert disclosure
- March 4, 2024: United States' and Defendant's exhibit and witness lists
- March 4, 2024: Motions in limine

- March 18, 2024: United States' and Defendant's updated exhibit and witness lists
- March 21, 2024: Proposed voir dire, jury instructions, and verdict form
- March 22, 2024: Responses to motions in limine
- March 25, 2024: pre-trial conference

The parties anticipate that the case can be tried in approximately 3 weeks.

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By: /s Michael N. Berger

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Court's CM/ECF system on December 20, 2023 and that a copy of the foregoing was thereby e-mailed to counsel of record.

By: /s/ Michael N. Berger
Assistant United States Attorney